

EXHIBIT A

9/19/2024

Richard Kadrey, et al. v. Meta Platforms, Inc. Todor Mihaylov, Ph.D.
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Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE MATTER OF:)
RICHARD KADREY, et al.,)
Plaintiff,)
vs.) C.A. NO.:
META PLATFORMS, INC.,) 3:23-cv-03417-VC
Defendant.)
)

** HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY **

UNDER THE PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF TODOR MIHAYLOV, Ph.D.

Palo Alto, California

Thursday, September 19, 2024

Stenographically Reported by:

HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR

Realtime Systems Administrator

California CSR License #11600

Oregon CSR License #21-0005

Washington License #21009491

Nevada CCR License #980

Texas CSR License #10725

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Page 2

1 VIDEOTAPED DEPOSITION of TODOR MIHAYLOV,
2 Ph.D., taken before Heather J. Bautista, CSR No.
3 11600, a Certified Shorthand Reporter for the state
4 of California, with principal office in the county
5 of Santa Clara, commencing on Thursday, September
6 19, 2024, 10:10 a.m., at 3175 Hanover Street, Palo
7 Alto, California 94304.

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9/19/2024

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Page 90

1 A. I'm not working -- I'm working on data that
2 is coming from the web.

3 Q. Does the web include books?

4 A. I don't know if the data I'm working with
5 includes books.

6 Q. So are you working, then, on a subset of
7 the Common Crawl?

8 A. I'm working on web data that comes from
9 HTML.

10 Q. And would -- would that data not include
11 books?

12 A. I haven't seen books in HTML data that I
13 have reviewed.

14 Q. Okay.

15 So when I showed you that e-mail, you
16 thought that LIBU -- LIB probably referred to
17 Library Genesis and we talked about what copyright
18 is.

19 Do you -- do you know whether Library
20 Genesis contains copyrighted material in it?

21 MR. WEINSTEIN: Same objection.

22 THE WITNESS: You defined it as books after

9/19/2024

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Page 210

1 I, HEATHER J. BAUTISTA, CSR No. 11600,

2 Certified Shorthand Reporter, certify:

3 That the foregoing proceedings were taken
4 before me at the time and place therein set forth,
5 at which time the witness declared under penalty of
6 perjury; that the testimony of the witness and all
7 objections made at the time of the examination were
8 recorded stenographically by me and were thereafter
9 transcribed under my direction and supervision; that
10 the foregoing is a full, true, and correct
11 transcript of my shorthand notes so taken and of the
12 testimony so given;

13 (XX) Reading and signing was not requested/offered.

14 I further certify that I am not financially
15 interested in the action, and I am not a relative or
16 employee of any attorney of the parties, nor of any
17 of the parties.

18 I declare under penalty of perjury under the
19 laws of California that the foregoing is true and
correct. Dated: September 23, 2024

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HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR